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March 29, 2021

MEMO ENDORSED

VIA ECF

Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Spencer Middleton v. Costco Wholesale Corporation
Docket No.: 20-CV-03062

Dear Judge Kaplan:

Our office is trial counsel for Leandros A. Vrionedes, P.C., attorneys for Plaintiff, Spencer Middleton. Plaintiff respectfully submits this letter-motion with consent from defense counsel to request a thirty (30) day extension of the current deadline to file the joint pre-trial order.

The Court previously granted four (4) prior discovery extension requests, which were filed on June 12, 2020, August 12, 2020, October 20, 2020, and February 5, 2021, respectively.

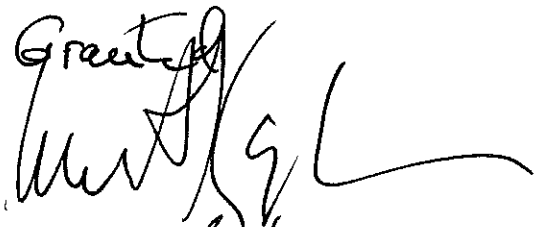
All fact and expert discovery in this matter has been completed. Under the Court's February 22, 2021 Order granting an extension of time, the joint pre-trial order is to be filed by March 31, 2021. However, due to a medical emergency in the family of lead trial counsel, Nicholas I. Timko, which required him to leave the state, the parties respectfully request a thirty (30) day extension to file the joint pre-trial order until April 30, 2021.

We thank Your Honor for your consideration of this request.

Respectfully Submitted,


Aisha Makhdoom

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3/30/21